

**To:** JEAN, RUTH[RJEAN@idem.IN.gov]  
**From:** Lee, Jae  
**Sent:** Fri 7/28/2017 8:28:50 PM  
**Subject:** RE: another question for Tradebe

It seem that there are thin film evaporator (area 1), liquid distillation unit (area 8), and pot still (area 8), which are not directly related to the TDUs.

Tradebe told me that they want to comply with CAA subpart DD for these distillation units instead of RCRA Subpart AA.

We might need a certification from Tradebe that they will comply with CAA per 264.1030(e).

Jae

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**From:** JEAN, RUTH [mailto:RJEAN@idem.IN.gov]  
**Sent:** Friday, July 28, 2017 8:47 AM  
**To:** Lee, Jae <lee.jae@epa.gov>  
**Subject:** RE: another question for Tradebe

Not that I'm aware of.

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**From:** Lee, Jae [mailto:lee.jae@epa.gov]  
**Sent:** Friday, July 28, 2017 9:46 AM  
**To:** JEAN, RUTH <RJEAN@idem.IN.gov>  
**Subject:** RE: another question for Tradebe

Thanks Ruth,

Are there any distillation (or thin film evaporation) units not related to the Thermal Desorption unit at Tradebe?

Hq's question was whether there is any exempted distillation unit (not directly connected to the TDU)

Jae

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**From:** JEAN, RUTH [mailto:RJEAN@idem.IN.gov]  
**Sent:** Friday, July 28, 2017 7:31 AM  
**To:** Lee, Jae <lee.jae@epa.gov>  
**Subject:** RE: another question for Tradebe

Jae, Your response is correct.

Ruth

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**From:** Lee, Jae [mailto:lee.jae@epa.gov]  
**Sent:** Thursday, July 27, 2017 2:38 PM  
**To:** JEAN, RUTH <RJEAN@idem.IN.gov>  
**Subject:** FW: another question for Tradebe

Ruth,

I got a question about Tradebe's RCRA permit from HQ.

Would you have any additional inputs for the question?

Jae

**From:** Lee, Jae  
**Sent:** Thursday, July 27, 2017 1:36 PM  
**To:** Galbraith, Michael <[Galbraith.Michael@epa.gov](mailto:Galbraith.Michael@epa.gov)>; Valentino, Michael <[valentino.michael@epa.gov](mailto:valentino.michael@epa.gov)>  
**Cc:** Gerhard, Sasha <[Gerhard.Sasha@epa.gov](mailto:Gerhard.Sasha@epa.gov)>  
**Subject:** RE: another question

My understanding is that the State RCRA permit includes no requirements for the treatments related to the recycling process (i.e., TDU and its associated processes) since it is RCRA exempted units.

I can double check with IDEM.

Jae

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**From:** Galbraith, Michael  
**Sent:** Wednesday, July 26, 2017 12:46 PM  
**To:** Valentino, Michael <[Valentino.Michael@epa.gov](mailto:Valentino.Michael@epa.gov)>; Lee, Jae <[lee.jae@epa.gov](mailto:lee.jae@epa.gov)>  
**Cc:** Gerhard, Sasha <[Gerhard.Sasha@epa.gov](mailto:Gerhard.Sasha@epa.gov)>  
**Subject:** RE: another question

That works – thanks!

Mike Galbraith  
 Permits Branch (5303P)  
 Program Implementation/Information Division  
 Office of Resource Conservation and Recovery  
 U.S. Environmental Protection Agency  
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 Washington, DC 20460

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**From:** Valentino, Michael  
**Sent:** Wednesday, July 26, 2017 1:26 PM  
**To:** Galbraith, Michael <[Galbraith.Michael@epa.gov](mailto:Galbraith.Michael@epa.gov)>; Lee, Jae <[lee.jae@epa.gov](mailto:lee.jae@epa.gov)>  
**Cc:** Gerhard, Sasha <[Gerhard.Sasha@epa.gov](mailto:Gerhard.Sasha@epa.gov)>  
**Subject:** RE: another question

Mike,

I'm going to defer to Jae on this one since he's the permits expert. I think Jae returns to the office tomorrow morning.

Michael

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**From:** Galbraith, Michael  
**Sent:** Wednesday, July 26, 2017 11:05 AM  
**To:** Valentino, Michael <[Valentino.Michael@epa.gov](mailto:Valentino.Michael@epa.gov)>; Lee, Jae <[lee.jae@epa.gov](mailto:lee.jae@epa.gov)>  
**Cc:** Gerhard, Sasha <[Gerhard.Sasha@epa.gov](mailto:Gerhard.Sasha@epa.gov)>  
**Subject:** another question

So I was flipping thru tradebe's RCRA permit, and could not find a description of exactly what is covered by the rcra permit. The front sections lists tank and container storage, tank treatment, and "other" treatment.

My specific question is likely a dumb one, but I'd like to know whether the RCRA permit covers treatment activities for processes such as thin film evaporation, distillation columns, and the pot still (i.e., are the other HW recycling activities exempt from the treatment permit requirements). Not concerned about applicability of only AA and BB, but rather whether the before mentioned activities are considered regulated "treatment activities".

I assume above processes exempt from treatment permit requirements, but would like to verify that.

Thanks!

Mike Galbraith  
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